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October 4, 2021

VIA ECF

The Honorable Roanne L. Mann
Chief United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: ABH Nature's Products, Inc. et al v.
Supplement Manufacturing Partner, LLC et al
Case No.: 19-CV-05637(LDH)(RLM)

Dear Judge Mann:

This firm represents plaintiffs/counterdefendants ABH Nature's Products, Inc., ABH Pharma, Inc. and Mohammed "Md" Jahirul Islam in this matter. We respectfully file this correspondence with Brett Lewis, Esq, attorney for defendants/counterclaimants as the parties Joint Post-Discovery Status Report as required pursuant to the Docket Text Order [47] entered July 21, 2021.


Discovery is completed and the parties now request to proceed with summary judgment motions. We are aware that pursuant to Your Honor's Individual Rules that all dispositive motions must be made to the presiding district court judge, i.e. The Honorable LaShann DeArcy Hall. Pursuant to Judge DeArcy Hall's Individual Practices at Section III. A.6.a), prior to filing a motion for summary judgment a pre-motion letter must be submitted fifteen (15) business days after the close of discovery. Discovery in this matter closed on October 4, 2021 thereby making any pre-motion letter related to summary judgment be submitted to Judge DeArcy Hall by October 19, 2021.

It is respectfully requested that the due date for any pre-motion letter related to summary judgment submitted to Judge DeArcy Hall be extended to November 2, 2021.

Thank you for your consideration.

TJM

Respectfully submitted,



Thomas J. Monroe